



EAC Decision on Request for Interpretation 2007-01, Rev. 2 2005 VVSG Vol. 1 Section 3.2.2.1 (e)

Date:

May 23, 2007

Question:

For AutoMARK Technical Systems (ATS), is the current keypad design acceptable as shown?

If the keypad is specifically designed for blind voters and not partially sighted voters, does it fall outside Section 3.2.2.1 (e)?

Facts:

If ATS states the buttons on the hardware are primarily for **blind** voters, would that make the requirement **not applicable** to the controls on the hardware device, but applicable to the controls displayed on the LCD screen, although all voters have the **option** of using the buttons on the hardware device if they choose so?

There are alternatives to using the button controls, such as having the **primary** keypad functions duplicated on the LCD touch screen. Additionally these functions are also “spoken” to the voter via synthesized voice, thus satisfying the partial vision requirement.

(See photos below)



Section of Standards or Guidelines:

Voluntary Voting System Guideline 2005 Volume 1 (version 1.0)

Volume 1: Section **3.2.2.1 e Partial Vision**

Buttons and controls on accessible voting stations shall be distinguishable by both shape and color.

Conclusion:

Suggested Interpretation - If the manufacturer states that the keypad buttons displayed on the hardware device are specifically for **blind** voters, and that the LCD screen is capable of meeting all visual and partial vision voter requirements, then the requirement in Section 3.2.2.1 (e) is **not applicable** to the controls on the hardware device, since the controls on the LCD screen do satisfy the partial vision requirement.

The EAC agrees with this interpretation **provided that the manufacturer declare, in the system user documentation, that they are addressing blind voters needs via the keypad and partially sighted voters needs via the touch screen.**

The VVSG clearly delineates between "Partial Vision" and "Blindness" as two separate, but related criteria for testing. Even though the keypad has English text in white characters, the characters appear to be designed for the benefit of testers and installers, not the intended blind user. Note that the keys are all blue, which indicates that no attempt is made to visually distinguish the different keys - that is done by Braille or the shape of the key. This would appear to be consistent with a device designed for blind users.

The keypad appears to be specifically designed for blind users and is therefore not subject to section 3.2.2.1. ATS provides a method for partially sighted voters to use the LCD panel

to navigate the system. Without further clarifying information or the ability to measure font sizes and contrast, it is not possible to determine if the LCD panel meets the requirements of Section 3.2.2.1, but it appears to have the potential to do so.